

MEMO ENDORSED



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August 23, 2023

VIA ELECTRONIC CASE FILING

Hon. Jessica G.L. Clarke
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Ingram v. International Asbestos Removal, Inc., et al.
Case No.: 22-cv-10149 (JGLC)

Your Honor:

This firm serves as counsel to Defendants in the above-referenced matter. We write in accordance with Your Honor's Individual Rules to respectfully request an adjournment of the upcoming conference scheduled for August 31, 2023. The adjournment is necessary because Defendants' lead counsel, Saul D. Zabell, Esq., is scheduled to be out of the state on the date and time of the conference. Due to the nature of the conference, Mr. Zabell's presence is required in accordance with Rule 3(f) of Your Honor's Individual Rules of Practice.

No prior request has been made to adjourn the upcoming conference as it was scheduled following the submission of the Parties' Joint Status Report on August 4, 2023. We have contacted Plaintiff's Counsel, The Law Offices of Barbara Meister Cummins, in connection with this request. Mr. Zabell's four (4) earliest dates of availability are September 8, September 25, October 3, and October 6. Ms. Cummins has advised that she would consent to our request to adjourn to one of the September dates, but objects to moving the conference to October. However, since Your Honor's Individual Rules require at least three (3) dates of mutual availability, and due to prior scheduling conflicts existing in September, we also offer the two (2) dates in October. Ms. Cummins has advised that notwithstanding her objection, she is presently available on all four (4) dates.



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We thank the Court for its time and attention to this matter. We remain available should the Court require additional information in connection with this submission.

Respectfully submitted,

ZABELL & COLLOTTA, P.C.

/s/ *Ryan M. Eden*

Ryan M. Eden

cc: Client

Application GRANTED. The status conference is hereby RESCHEDULED for **September 25, 2023 at 11:00 a.m.** in Courtroom 20C of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York.

SO ORDERED.

JESSICA G. L. CLARKE
United States District Judge

Dated: August 24, 2023
New York, New York